

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc., *et al.*¹

The Debtors.

Chapter 11

Bky Case No. 23-10763 (AMC)
(Jointly Administered)

DECLARATION OF MARK HSU

I, Mark Hsu, pursuant to 28 U.S.C § 1746, hereby declare under penalty of perjury:

1. I respectfully submit this declaration in support of *Visual Semiconductor, Inc.'s Objection to Motion of William A. Homony in his Capacity as Chapter 11 Trustee for an Order Approving (a) the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (b) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto and (c) Granting Related Relief* [ECF No. 850] (the "**Objection**"). Other than as set forth expressly herein, this declaration is based upon personal knowledge.

2. I am the former head of the Silicon Valley Team for Stream TV Networks, Inc. ("**Stream TV**") and working in 2018, 2019 and part of 2020 reporting directly to Mathu Rajan, CEO.

3. Stream TV invested heavily in the Silicon Valley Team. My team, the Silicon Valley Team, developed the production code, which incorporated Stream TV trade secrets, as well as protected the intellectual property of Rembrandt and Phillips, all of which was housed on Stream TV's Silicon Valley based servers.

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

4. My understanding is that the Stream TV servers containing the Stream TV production code were stolen by Shadron Stastney in 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 4, 2024 STREAM TV NETWORKS, INC.

By: Mark Hsu

Mark Hsu

Title: Former Head